

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

|                                |   |                         |
|--------------------------------|---|-------------------------|
| <b>DEEP SEA FINANCING, LLC</b> | ) |                         |
| <b>Plaintiff,</b>              | ) |                         |
|                                | ) |                         |
| <b>v.</b>                      | ) | <b>CIVIL ACTION NO.</b> |
|                                | ) | <b>CV409-023</b>        |
| <b>DRAGADOS MUNDIALES DEL</b>  | ) |                         |
| <b>CARIBE S.A. DE C.V.,</b>    | ) |                         |
| <b>Defendant.</b>              | ) |                         |

**DEEP SEA FINANCING, LLC'S**  
**MOTION TO DISMISS CROSSCLAIM AGAINST**  
**DRAGADOS MUNDIALES DEL CARIBE S.A. DE C.V.**

Deep Sea Financing, LLC hereby moves this Court to dismiss without prejudice its crossclaim against Dragados Mundiales Del Caribe S.A. de C.V.

This 26<sup>th</sup> day of November, 2013.

RONALD C. BERRY, P.C.  
Post Office Box 10223  
Savannah, Ga. 31412  
(912) 231-8777

/s/ Ronald C. Berry  
Ronald C. Berry,  
Georgia Bar No. 055655  
Attorney for Deep Sea Financing, LLC

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| <b>DEEP SEA FINANCING, LLC</b> | ) |                         |
| <b>Plaintiff,</b>              | ) |                         |
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|                                | ) | <b>CV409-023</b>        |
| <b>DRAGADOS MUNDIALES DEL</b>  | ) |                         |
| <b>CARIBE S.A. DE C.V.,</b>    | ) |                         |
| <b>Defendant.</b>              | ) |                         |

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served the foregoing Deep Sea Financing, LLC's motion to dismiss crossclaim against Dragados Mundiales Del Caribe S.A. de C.V. by depositing a properly addressed copy thereof, postage prepaid, in the United States Mail upon:

Charles Newlin  
c/o Dragados Mundiales Del Caribe de C.V.  
135 Sea View Drive  
Aransas Pass, Texas 78336

This 26<sup>th</sup> day of November, 2013.

RONALD C. BERRY, P.C.  
Post Office Box 10223  
Savannah, GA 31412  
(912) 231-8777

/s/ Ronald C. Berry  
Ronald C. Berry  
Georgia Bar Number 055655  
Attorney for Deep Sea Financing, LLC